



Ethyl Petroleum Additives
Sauget, Illinois 62201
(618) 274-4000

December 21, 1984

Mr. Dan Hopkins
On-Scene Coordinator
U.S. EPA, Region 5
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Hopkins:

In accordance with our discussions at our meeting on December 17, 1984, I am providing a description of current construction projects for approval. I am also providing a description of repairs that involve soil movement that may be necessary but not specifically planned.

Unit 270 Expansion. These projects are in several locations in the southwest portion of the plant away from the black tanks. The projects all related to our HiTEC 611 (calcium overbase sulfonate) process. These projects are: A small new structure (N050: E150-Area A); a storage tank (N150: E100 - Area B); a storage tank (N250: E050-Area C) including extension of track 18 to the south; a small building (N100: E025-Area D); two storage tanks (N550: E100-Area E); and a cooling tower (N350: E350-Area F). The cooling tower may require digging to six feet to support the tower; the other projects would involve only laying shallow footings to support the tank or building walls. Any excavated dirt that is not backfilled will be taken to the northeast portion of the plant and sampled. If the samples confirm the expected non-detectable levels, the removed earth will be used without restriction. If the removed earth has contamination above the one ppb detection limit, the earth will be moved to the covered area in the northwest part of the plant.

NC Warehouse Expansion (N900: E200-Area G). The expansion would be over a concreted area that is the remaining portion of a razed building. Because the building was in place during Monsanto's Agent Orange activity on plant, there should be no contamination above the one ppb detection level in the soil under this concrete. The excavation necessary to lay footings to support the walls will be the only disturbance. Removed earth will be handled as with the Unit 270 expansion

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These projects are submitted for review on a case-by-case basis until such time as the extent of contamination is better characterized and we can reach agreement on a generic plan as outlined in my letter of November 26, 1984.

We also discussed unplanned remedial activities that may involve soil movement. There are underground gas, water, sewer and fire protection lines on site. There are a few underground steam connections and no underground chemical lines. Since any line may suffer an unplanned blockage or cave-in, we have no choice but to move soil, repair the situation, and refill the area. Since this would be no more than returning to the status quo ante, there is no problem with removal of earth. The health and safety plan previously approved will be utilized for repairs of underground lines in areas where there is known to be or can reasonably be expected to be contamination at or above one ppb.

We will proceed as outlined with the Unit 270 expansion, the NC warehouse expansion and the projects north and east of the black tanks, assuming there will be no problems raised in the review of these projects that involve only minimum earth movement in areas where contamination is not expected to be a problem. In areas where there may be movement of contaminated earth, we will work to minimize earth movement, utilize the health and safety plan and protect removed earth. With these precautions, you indicated that the projects should be able to be approved in an expedited fashion. We will work with you and/or IEPA to find an acceptable landfill for the razed structure. If you have additional questions, please contact either me or Jim Saprks. In addition if you feel it necessary, we will gladly review these plans with you in person.

Very truly yours,



Sam McWilliams

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cc: Mr. D. C. Bach
Mr. D. E. Park